## Jerrican-Style Safety Can Option in Accordance with DOT's Material of Trade Exemption (1)

- 1. Type: Jerrican-style safety can that is UL listed as a safety can and is fabricated in accordance with DOT Performance Oriented Packaging standards UN 3A1 or UN 1A1.
- 2. Size: 2.5 to 5 gallons.
- 3. Maximum Number of Full Safety Cans that Can Be Transported: Nine full fivegallon jerrican-style safety cans can be transported provided the total weight of all hazardous materials being transported, including their packagings, not to exceed 440-pounds. A full jerrican-style safety can weighs approximately 45-pounds. If hazardous materials other than drip torch fuel in safety cans are transported (e.g., drip torches, fusees, saw gas) are also being transported, the number of safety cans being transported must be reduced to ensure the total weight of all hazardous materials being transported is less than 440-pounds. [Note: An empty drip torch that contains fuel residue weighs approximately five-pounds, full it weighs 12.875-pounds. Unless an empty container has been purged, its weight must be included in the total weight of hazardous material being transported.] A limit of nine full jerrican-style safety cans is necessary to ensure compliance with DOT's Materials of Trade Exemption. In accordance with the exemption, the only DOT requirements are as follows: 1) hazardous materials must be labeled with their common or proper shipping name, 2) total weight of hazardous materials being shipped cannot exceed 440-pounds, 3) maximum container size is eight gallons, 4) fuel is transported in a safety can that complies with OSHA regulation 29 CFR 1910.106(d)(2) or a DOT specification container, and 5) vehicle operator must be informed of the presence of the hazardous materials they are transporting and the exemption requirements. Under this exemption, preparation of shipping papers and other DOT regulations are not applicable. If more than the recommended maximum number of safety cans or more than 440pounds of hazardous material is transported, compliance with all DOT regulations regarding marking, labeling, placarding, and shipping papers is required.
- 4. Location: Within the truck bed outside of impact zone.
- 5. Securing: Safety cans to be secured against movement within the confines of the truck bed.
- 6. Safety Can Filling: Safety cans must be removed from truck and placed directly on ground prior to filling.
- 7. Fuel Dispensing: Torch to be in direct contact with ground when being filled with fuel. Safety can nozzle to be in contact with open torch before dispensing.
- 8. Fire Protection: 2A 10 B:C extinguisher to be located outside of truck bed and cab within reach of torch filling area before dispensing fuel.
- 9. Safety Can Inspection Criteria: Can to be visually inspected prior to filling and be replaced and properly disposed of if one or more of the following criteria is met:
  - a. Permanent convex bulging of the can.
  - b. Gaps, bulges, or seam separations.
  - c. Any visible leaking or seepage.

- d. Dents or gouges greater than 1/8-inch deep from plane of surrounding surface.
- e. Dents or gouges greater than 1-inch in length.
- a. Significant rust.
- b. Any can exposed to fire or intense heat regardless of visual condition. Damaged safety can to be drained of all fuel, spring loaded lid removed, and can allowed to air dry outside, but protected from the rain, for at least 24-hours. The damaged safety can may be placed in the trash following these procedures.
- 10. Marking: Mark the can with the proper shipping name of the can's contents. The proper shipping name for drip torch fuel is "FLAMMABLE LIQUID, n.o.s., (diesel and gasoline mixture), UN 1993." Remark the can as necessary if it is used to transport or store other flammable or combustible liquids. The markings for the proper shipping name must have a width of at least 0.16-inch and a height of one-inch. The can cannot have any old markings on it that may obscure or reduce the effectiveness of this required marking.
- 11. Labeling: Cans are properly labeled "FLAMMABLE LIQUID" by their manufacturer. Maintain or replace label as necessary. The label has a red background with white text. The label design is shown in 49 CFR 172.419. The can cannot have any old labels on it that may obscure or reduce the effectiveness of this label.

## Footnote:

(1) MTDC has developed improvements to the Safe-T-Way, Safety Transport, jerricanstyle safety can to minimize their potential to leak and make dispensing easier. Those improvements will be field tested by BLM and Forest Service offices this fire season. If the improvements are successfully field tested, MTDC will be working with vendors to determine the improvements' impact on the jerrican-style safety can's UL listing, DOT compliance, and cost. The intent is to have industry adopt these improvements. However, whether vendors will adopt these improvements is unknown at this time. Use of steel jerricans will not be considered a CASHE finding until jerrican-style safety cans with the successful MTDC improvements are commercially available. Offices may continue to use their jerrican-style safety cans. Steel jerricans may be used instead of the jerrican-style safety cans that have leakage or fuel dispensing problems during this period when the improved jerrican-style safety cans are not available. Plastic jerricans cannot be used. When the improved jerrican-style safety cans are available, all BLM offices and fire crews will again be required to purchase and use them and use of steel jerricans will be prohibited.